

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

KENDRICK DEMON STIDOM, §
§
Plaintiff, §
§
vs. § CIVIL ACTION NO. 3:21-CV-01389-N
§
JP MORGAN CHASE BANK, §
NATIONAL ASSOCIATION, §
§
Defendant. §

**DEFENDANT'S AGREED MOTION TO EXTEND DEADLINE TO ANSWER OR
OTHERWISE RESPOND TO PLAINTIFF'S ORIGINAL COMPLAINT**

Defendant JPMorgan Chase Bank, N.A. (incorrectly named JP Morgan Chase Bank, National Association) (“Defendant” or “JPMC”) files this Agreed Motion to Extend Deadline to Answer or Otherwise Respond to Plaintiff’s Original Complaint, and would respectfully show the Court as follows:

I.

1. Plaintiff Kendrick Demon Stidom (“Stidom”) filed his Original Complaint (the “Complaint”) against Defendant on June 14, 2021.

2. Defendant was served with the Complaint on June 21, 2021. Defendant’s deadline to answer, move or otherwise respond was therefore July 12, 2021.

3. On July 8, 2021, in-house counsel for JPMC contacted counsel for Plaintiff regarding JPMC’s deadline to respond to the Complaint. JPMC was in the process of retaining outside counsel in connection with the instant action, and therefore requested that Plaintiff stipulate to extending JPMC’s deadline to answer to August 23, 2021. Plaintiff’s counsel expressed “no objection to an extension until August 23 to answer [or] otherwise respond to the complaint.”

4. JPMC therefore requests that its deadline to answer, move or otherwise respond to the Complaint be extended to **August 23, 2021**.

5. This motion is made in good faith, for purposes of preserving judicial and party resources, and not for the purpose of causing undue delay. Given the early stage of litigation, there is no danger of prejudice to the opposing party nor will the length of the delay impact the judicial proceedings. For the reasons set forth herein, there is good cause and excusable neglect for the Court to extend JPMC's deadline to answer, move or otherwise respond to the Complaint. *See Fed. R. Civ. P. 6(B)(2) (permitting a court to extend the time to answer, for good cause, on motion made after the time has expired if the party failed to act because of excusable neglect).*

II.

WHEREFORE, Defendant JPMorgan Chase Bank, N.A. respectfully requests that its Agreed Motion to Extend Deadline to Answer or Otherwise Respond to Plaintiff's Original Complaint be granted and that Defendant's deadline to answer, move or otherwise respond be extended to August 23, 2021.

Respectfully submitted,

By: /s/ John V. Jansonius
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**ATTORNEYS FOR JPMORGAN
CHASE BANK, N.A.**

CERTIFICATE OF CONFERENCE

I certify that I conferred with Plaintiff's counsel, Nicholas O'Kelly, on August 6, 2021, and Plaintiff Kendrick Demon Stidom has agreed to the relief sought herein.

/s/ Shelisa E. Brock
Shelisa E. Brock

CERTIFICATE OF SERVICE

This is to certify that on August 9, 2021, a true and correct copy of the foregoing document was served electronically via ECF on all counsel of record.

/s/ John V. Jansonius
John V. Jansonius

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